
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

(1) LADONNA PARIS,

Plaintiff,

vs.

Case No. 22-CV-235-TCK-JFJ

(1) RONNI CARROCIA, *et al.*,

Defendants.

JOINT MOTION FOR EXTENSION OF DEADLINE
TO ANSWER OR OTHERWISE RESPOND

Defendants Ronni Carrocia and Ty Burns (“Defendants”) move jointly for an order from this Court extending their deadline to file answers or responses to Plaintiff Ladonna Paris’s Petition from June 21, 2022 (Officer Carrocia) and June 28, 2022 (Officer Burns) to July 5, 2022. In support, Defendants show the Court the following:

1. Plaintiff Paris filed her Petition on May 10, 2022, in the District Court of Tulsa County. *See* Notice of Removal, Doc. 1.
2. Defendant City of Tulsa removed the Petition to this Court on May 27, 2022. *See* Doc. 1.
3. Defendant Ronni Carrocia, upon information and belief, was served with the Petition on or about May 31, 2022, making her answer or other response, under Fed. R. Civ. P. 12(a)(1)(A)(i), due Tuesday, June 21, 2022.

4. Defendant Ty Burns was served with the Petition on June 6, 2022. *See* Affidavit of Service, Doc. 9, making his answer or other response, under Fed. R. Civ. P. 12(a)(1)(A)(i), due Monday, June 27, 2022.

5. Defendants have not made a previous request for a time extension, but now request an extension of answer/response deadlines to July 5, 2022. For Defendant Carrocia, this is a two-week extension; for Defendant Burns, this is an eight-day extension.

6. An extension is necessary because the undersigned was only recently retained to represent these Defendants and is in need of important information from the Defendants that will assist counsel in more fully and thoroughly responding to the allegations made in Plaintiff Paris's Petition.

7. Plaintiff does not object to this request.

8. The undersigned states that this request is not being made for purposes of undue delay, evasion or unfair advantage. Further, the undersigned does not anticipate that this limited requested extension will affect any dates in this matter as a Scheduling Order has not yet been entered.

WHEREFORE, Defendants Ronni Carrocia and Ty Burns ("Defendants") move jointly for an order from this Court extending their deadline to file answers or responses to Plaintiff Ladonna Paris's Petition to July 5, 2022.

Date: June 20, 2022

s/ Jeffrey C. Hendrickson

Jeffrey C. Hendrickson, OBA #32798

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Attorney for Defendants

Ronni Carrocia and Ty Burns

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2022, I electronically submitted the attached document to the Clerk of Court using the ECF system for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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s/ Jeffrey C. Hendrickson

Jeffrey C. Hendrickson